## MILMAN LABUDA LAW GROUP PLLC

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March 27, 2023

**VIA ECF** 

**United States District Court** Southern District of New York

Attn: Hon. Lorna G. Schofield, U.S.D.J. Dated: March 28, 2023 40 Foley Square, Courtroom 1106

New York, NY 10007-1312

Application GRANTED nunc pro tunc. The parties shall file the materials below by March 29, 2023.

New York, New York

UNITED STATES DISTRICT JUDGE

Edelman v. NYU Langone Health System, et al. Re:

Case No.: 1:21-cv-502 (LGS) (GWG)

MLLG File No.: 209-2020\_

Dear Judge Schofield:

This firm represents the Plaintiff, Dr. Sari Edelman (hereinafter "Plaintiff" or "Dr. Edelman"), in the above-referenced case. Plaintiff writes, with the consent of Defendants, to respectfully seek a two (2) day extension, until Wednesday, March 29, 2023, of the parties' deadline to submit the parties' joint requests to charge, voir dire, verdict form, and any memorandum of law.

Pursuant to this Court's September 20, 2022 Order (the "Order"), see Docket Entry 156, the parties' deadline to submit the aforementioned documents is today, March 27, 2023.

Pursuant to ¶ I(B)(2) of this Court's Individual Rules and Civil Procedures, there has been no previous request for an extension of this specific deadline. The reason for the request is that, among other deadlines and appearances, Plaintiff's counsel was before the Hon. Pamela K. Chen, U.S.D.J. on a hearing for a preliminary injunction which your undersigned spent significant time preparing for over the last week. As a result, the parties could not coordinate submissions for today.

It is respectfully submitted that the requested extension should not affect any of the Court's other deadlines, although the parties respectfully reserve the right to seek an appropriate extension of time should the need arise.

Plaintiff therefore respectfully submits that there is good cause for granting the requested two (2) day extension. See Fed. R. Civ. P. 6(b)(1)(A).

Accordingly, Plaintiff's consent letter motion for an extension of time to submit the aforementioned trial documents should be granted. Plaintiff thanks this Court for its time and attention to this case.

Hon. Lorna G. Schofield, U.S.D.J. March 27, 2023 Page | 2

Dated: Lake Success, New York March 27, 2023

Respectfully submitted,

## MILMAN LABUDA LAW GROUP PLLC

/s\_\_\_

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cc: Defendants (via ECF).